



479105

**Moynihan, Colleen**

**From:** Frey, Rebecca  
**Sent:** Tuesday, July 26, 2016 11:02 AM  
**To:** Moynihan, Colleen  
**Subject:** FW: Ten-Mile Drain - SSC amendment needed - reply requested

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

And this one, too.

Becky Frey  
Chief, Remedial Response Section #3  
Superfund Division  
EPA Region 5  
312-886-4760  
[frey.rebecca@epa.gov](mailto:frey.rebecca@epa.gov)

---

**From:** Frey, Rebecca  
**Sent:** Thursday, September 10, 2015 4:45 PM  
**To:** Kline, David (DEQ) <[KLINED@michigan.gov](mailto:KLINED@michigan.gov)>  
**Cc:** Devantier, Daria W. (DEQ) <[DEVANTIERD@michigan.gov](mailto:DEVANTIERD@michigan.gov)>; Moynihan, Colleen <[moynihan.colleen@epa.gov](mailto:moynihan.colleen@epa.gov)>; Bradsher, Esther (DEQ) <[BRADSHERE@michigan.gov](mailto:BRADSHERE@michigan.gov)>; Kowal, Kathleen <[kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov)>  
**Subject:** RE: Ten-Mile Drain - SSC amendment needed - reply requested

Thanks for the quick reply, Dave. EPA will be in touch with your staff soon regarding the SSC amendment.

Becky Frey  
Acting Chief, Remedial Response Branch #2  
Superfund Division  
EPA Region 5  
312-886-4760  
[frey.rebecca@epa.gov](mailto:frey.rebecca@epa.gov)

---

**From:** Kline, David (DEQ) [<mailto:KLINED@michigan.gov>]  
**Sent:** Thursday, September 10, 2015 3:36 PM  
**To:** Frey, Rebecca  
**Cc:** Devantier, Daria W. (DEQ); Moynihan, Colleen; Bradsher, Esther (DEQ)  
**Subject:** RE: Ten-Mile Drain - SSC amendment needed - reply requested

Hi Becky:

Thanks for your note. The MDEQ agrees that the proposed additional remedial action is appropriate and necessary to ensure the recently excavated area does not become re-contaminated. We also agree that this work should be done as soon as possible. We agree that an amendment to the SSC is warranted and we intend to work with EPA to expedite the SSC amendment with a goal to execute it by the end of September. To accomplish this we will need you to get us a draft SSC amendment as soon as possible; hopefully, by early next week.

David Kline, Chief  
Superfund Section  
Remediation and Redevelopment Division  
Michigan Department of Environmental Quality  
517-284-5121

---

**From:** Frey, Rebecca [<mailto:frey.rebecca@epa.gov>]  
**Sent:** Thursday, September 10, 2015 4:06 PM  
**To:** Kline, David (DEQ)  
**Cc:** Devantier, Daria W. (DEQ); Moynihan, Colleen  
**Subject:** Ten-Mile Drain - SSC amendment needed - reply requested

Hi Dave,

Per our telephone conversations today, this email message requests written confirmation (by email reply) that: (1) MDEQ agrees that it makes sense to conduct additional remedial action work now at the Ten-Mile Drain site (with an Explanation of Significant Differences to follow later); (2) that MDEQ is willing to amend and sign an SSC for the additional work; and (3) that MDEQ is willing to work with EPA to expedite the SSC, with both parties working diligently toward executing the SSC by the end of September 2015.

#### Background

As you know, EPA is currently conducting a remedial action at the site to remove and replace two vaulted manhole locations (M7179 and J01) where high concentrations of PCBs had been found. After dewatering and excavating M7179, high-concentration PCB oil was discovered coming out of the storm sewer pipe that runs between M7179 and J01, threatening to recontaminate location M7179 and to serve as an ongoing source of contamination to the canals. The oil was coming from the space between the concrete pipe and the cured-in-place liner that was installed inside the pipe during a prior EPA removal action. It is likely that oil is also located outside/beneath the pipe but within the confines of the storm sewer utility trench between the two vaulted manhole locations. (Oil was not found exiting the pipe at location J01 following excavation at that location.)

EPA believes that it is prudent to remove and replace now the 120' length of pipe that runs between the two locations, along with any contaminated fill materials, while the excavations are still open, in order to remove this ongoing source material from the system. Cost efficiencies would also be realized by doing the work now vs. a later mobilization effort. EPA would modify the selected remedy by issuing an after-the-fact ESD, after review and comment by MDEQ.

EPA HQ is providing Region 5 with additional remedial action funding for this project that needs to be obligated by the end of September, in the amount of \$1M. The SSC amendment would therefore reflect an increase in state cost share of \$100,000. (You indicated during one of our phone conversations that this amount falls below the threshold that would require the matter going before the MDEQ Ad.Board, thus shaving some time off the SSC process.)

Please let me know if you need any additional information. I look forward to your reply.

Thanks very much!

-Becky

Becky Frey

Acting Chief, Remedial Response Branch #2

Superfund Division

EPA Region 5

312-886-4760

[frey.rebecca@epa.gov](mailto:frey.rebecca@epa.gov)